

### REMARKS/ARGUMENTS

Favorable reconsideration of this application, in light of the present amendments and following discussion, is respectfully requested.

Claims 1-12 are pending; Claims 13-16 are cancelled; and no claims are newly added or amended herewith. It is respectfully submitted that no new matter is added by this amendment.

In the outstanding Office Action, Claims 1-12 were rejected under 35 U.S.C. § 112, first paragraph; the drawings were objected to under 37 C.F.R. § 1.83(a); Claims 1-12 were rejected under 35 U.S.C. § 103(a) as unpatentable over Jones et al. (U.S. Pat. No. 6,141,341, hereafter “the ‘341 patent”) in view of Hakim et al. (U.S. Pat. No. 6,614,780, hereafter “the ‘780 patent”) and Sosnowski (U.S. Pat. No. 5,754,640, hereafter “the ‘640 patent”); and Claims 13-16 were rejected under 35 U.S.C. § 103(a) as unpatentable over the ‘341 patent in view of the ‘780 patent.

At the outset, Applicant respectfully requests acknowledgement of the Information Disclosure Statement (IDS) filed on November 7, 2001. Copies of the papers as filed, including the date stamped filing receipt, are included herewith for the Examiner’s reference.

Applicant thanks Examiner Eng for the telephone interview granted Applicant’s representative. During this interview, the outstanding rejection of Claims 1-12 under 35 U.S.C. § 112, first paragraph, was addressed. As explained during the interview, the outstanding rejection of Claims 1-12 under 35 U.S.C. § 112, first paragraph, is respectfully traversed.

As described in a non-limiting example in the specification at paragraph [0017], the call processor 120 may also provide local called number translation. For example, the remote call handler may not be able to provide 800 number services (e.g., the 800 number may not be accessible to a second interface). Accordingly, the database would include an entry for

numbers beginning with 800. By way of example, the database may include a translation entry for the number 800-555-1212 to a local number (e.g, 973-555-1212). This local number can be accessed by both the first interface (POTS) and the second interface (interface 140). In this way, the database can override use of the POTS interface 130 and increase the use of the secondary interface 140. This method is illustrated in Figure 2. Therefore, as the specification provides adequate written description for the claimed features, it is respectfully requested that the outstanding rejection of Claims 1-12 under 35 U.S.C. § 112, first paragraph, be withdrawn.

With regard to the objection to the drawings, that objection is respectfully traversed. As discussed above, the claimed features are illustrated in Figure 2. Accordingly, it is respectfully requested that this objection be withdrawn.

With regard to the outstanding rejection of Claims 1-12 under 35 U.S.C. § 103(a) as unpatentable over the '341 patent in view of the '780 patent and the '640 patent, that rejection is respectfully traversed. Claim 1 recites, in part, a system for routing a call, the system comprising a telephone number converter for converting a first number, accessible by the first telephone line interface but not accessible via the second telephone line interface, to a second number, accessible via the first and second telephone line interfaces when the first number is determined to match the stored telephone number.

The Office Action admits at page 6 that neither the '341 patent nor the '780 patent discloses or suggests that the second number is accessible by the first and second telephone line interfaces. The Office Action attempts to remedy this admitted deficiency of the combination of the '341 patent and the '780 patent by relying on the '640 patent, and asserts that the '640 patent teaches the technique to convert a first telephone number to a second number accessible via the first and second telephone line interfaces.

However, the '640 patent actually fails to teach converting a first number to a second number where a telephone number is accessible by both first and second interfaces. Rather, the '640 patent describes dialing an access number of a selective telephone network through a central switching office, and retransmitting the individual digits of the outgoing destination telephone number to this selected telephone network (at col. 6, lines 10-26). There is no translation of the destination telephone number involved in this transmission, because the outgoing destination telephone number is not converted to a second number. To the contrary, the destination telephone number is retransmitted (not translated) according to the '640 patent.

Thus, because the '640 patent fails to teach converting a first number to a second number where the second number is accessible by both the first and second interfaces, it is respectfully submitted that the outstanding Office Action has failed to provide a *prima facie* case of obviousness, and it is therefore respectfully requested that the rejection of Claims 1-12 be withdrawn.

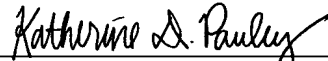
Moreover, it is respectfully submitted that there is no basis in the teachings of any of the '341 patent, the '780 patent, or the '640 patent to support the applied combination. As set forth in MPEP § 2143.01, the mere fact that references may be combined does not render the resultant combination obvious. Rather, there must be some suggestion in the references themselves to provide motivation for the combination. Certainly, in this case, the outstanding Office Action fails to cite to any specific teachings in any of the applied references to support the combination of the '341 patent, the '780 patent, and the '640 patent. It is therefore respectfully submitted that the applied combination of the '341 patent, the '780 patent, and the '640 patent is the result of hindsight reconstruction in view of the Applicant's own specification, and is improper.

With respect to the outstanding rejection of Claims 13-16 under 35 U.S.C. § 103(a), Claims 13-16 have been cancelled herewith. Thus, this rejection has been rendered moot by the present amendment.

Consequently, in view of the foregoing discussion and present amendments, it is respectfully submitted that this application is in condition for allowance. An early and favorable action is therefore respectfully requested.

Respectfully submitted,

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